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ORIGIN ARA-10

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DRAFTED BY ARA/MEX:JFKEANE:AC

APPROVED BY ARA/MEX:JTDREYFUSS

ARA:GBROWN (DRAFT)

EPA:TADAMCYWK (SUBS)

USDA:WGENTNER (SUBS)

DESIRED DISTRIBUTION

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SUBJECT: HERBICIDES FOR POPPY ERADICATION

REF: ALBERTI-KEANE TELCON OF 3/18/75

1. ENVIRONMENTAL PROTECTION AGENCY REGISTERS HERBICIDES IF IT IS SATISFIED ABOUT VALIDITY OF MANUFACTURERS' REGISTRATION STATEMENT CONCERNING PRODUCT'S EFFECTIVENESS AND GENERAL SUITABILITY (INCLUDING ENVIRONMENTAL), AND IF IT CONFORMS TO CLAIMS ON PRODUCT LABEL. PARAQUAT AND GLYPHOSATE ARE REGISTERED.ACCORDING TO DR. WALTER GENTNER, AGRICULTURE RESEARCH CENTER, USDA AND THOMAS ADAMCYWK, EPA, PRODUCT'S PERFORMANCE IN SUPPRESSING PESTS MAY EXCEED WHAT MANUFACTURER'S LABEL CLAIMS ARE ITS MINIMUM CAPABILITIES. FOR ECONOMY REASONS MANUFACTURERS PREFER TO OBTAIN EARLY REGISTRATION BY PROVING THAT PRODUCT IS EFFECTIVE IN CONTROLLING WEEDS WHICH HINDER DEVELOPMENT OF A SINGLE MAJOR CROP, SAY SOYBEANS, (RATHER THAN SEVERAL LIMITED OFFICIAL USE

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CROPS BECAUSE OF THE DELAY INVOLVED), AND THAT IT MEETS

MINIMUM STANDARDS OF SUITABILITY. HENCE, PRODUCT MAY OUTPERFORM CLAIMS ON LABEL IN OTHER ASPECTS; (E.G. SELECTIVITY), AND LABELS OFTEN OVERSTATE POTENTIAL HARMFUL IMPACT OF HERBICIDES (E.G. A PRODUCT MAY BE LESS TOXIC TO HUMANS AND WILDLIFE THAN A LABEL SUGGESTS) IN ORDER TO PROTECT THE MANUFACTURER BECAUSE HE HAS NOT HAD TIME NOR MONEY TO RUN ALL CONCEIVABLE TESTS. USDA OR

EPA MAY SOMETIMES HAVE MORE COMPLETE TEST DATA AND KNOW MORE ABOUT A PRODUCT'S ADVANTAGES AND DISADVANTAGES. ON OCCASION MANUFACTURERS WILL RECOMMEND TYPES OF USES OR FORMS OF APPLICATIONS WHICH ARE NOT INCLUDED IN LABEL. TO ILLUSTRATE, STUDIES OF GLYPHOSATE BY GENTNER DEMONSTRATE THAT IT HAS MANY EXCELLENT PROPERTIES NOT EXPLAINED ON LABEL; E.G. SOMEWHAT SELECTIVE, BIO DEGRADABLE, VERY LOW TOXICITY TO NON-TARGETS ETC., WHICH MAY MAKE IT SUITABLE FOR MEXICAN POPPY ERADICATION. FIELD TESTS MUST OF COURSE PRECEDE WIDE USAGE. ADAMCYWK CONFIRMS THAT ROUNDUP IS VERY LOW IN TOXICITY FOR HUMANS, WILDLIFE AND NON-TARGET PLANTS. IN ADDITION, HE SAYS IT BINDS VERY TIGHTLY TO SOIL PARTICLES UPON CONTACT AND HENCE THERE IS LITTLE OR NO CHANCE OF RUNOFF INTO STREAMS OR PONDS. IT WILL NOT LEACH AND BREAKS DOWN QUICKLY. EVEN UNDER WORST POSSIBLE CONDITIONS IT WILL NOT REMAIN TOXIC FROM ONE GROWING SEASON TO THE NEXT. PROLONGED CONTACT WITH HUMAN SKIN WILL RESULT IN IRRITATION. EPA ISSUES A COMPENDIUM OF REGISTERED PRODUCTS WHICH SUMMARIZES CONTENTS OF MANUFACTURERS LABEL REGARDING THE TOLERANCES, USE AND LIMITATIONS OF EACH PRODUCT.

2. PER REF TELCON, SUMMARY OF PERTINENT INFORMATION FROM LABELS OF ROUNDUP AND PARAQUAT FOLLOWS:

(A) ROUNDUP: FOR CONTROL OF ANNUAL AND PERENNIAL GRASSES AND WEEDS. DESTROYS TISSUES OF MANY HERBACEOUS PLANTS. AVOID CIRCUMSTANCES SUCH AS WIND AND COMBINATION OF NOZZLE AND PRESSURE THAT WILL RESULT IN MIST AND LIKELIHOOD OF DRIFT, SINCE ROUNDUP WILL CAUSE DAMAGE TO NEARBY SUSCEPTIBLE CROPS. THE LABEL SAYS THAT ROUNDUP LIMITED OFFICIAL USE

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SHOULD NOT BE APPLIED USING AERIAL SPRAY EQUIPMENT. HOWEVER, MONSANTO HAS INFORMED DR. GENTNER THAT HELICOPTERS CAN BE USED BECAUSE OF DIRECTED SPRAY TECHNIQUE AFFORDED BY HELIBORNE AERIAL SPRAYING. ALSO, CONVENTIONAL BOOM EQUIPMENT MAY BE USED. ROUNDUP IS HARMFUL TO PERSONS AND ANIMALS IF INGESTED OR IN PROLONGED CONTACT WITH SKIN. DELAY APPLICATION UNTIL THERE IS ADEQUATE LEAF SURFACE, SINCE UNEMERGED TISSUES ARISING

FROM ROOT STOCKS OF PERENNIALS ARE UNAFFECTED. (HOWEVER, DR. GENTNER'S STUDIES INDICATE THAT ROUNDUP IS TRANS-LOCATED THROUGHOUT AERIAL AND UNDERGROUND PORTIONS OF THE CONTACTED PLANT FOLLOWING ABSORPTION THROUGH FOLIAGE. THE UNDERGROUND PLANT PARTS OF PERENNIAL SPECIES ARE AFFECTED, RESULTING IN FAILURE OF REGROWTH FROM THESE PROPAGATION SITES. ROOT UPTAKE FROM SOIL IS LOWER THAN FOR OTHER HERBICIDES.)

(B) PARAQUAT: THIS IS A VERY TOXIC NON-SELECTIVE HERBICIDE FOR CONTROL OF WEEDS AND GRASSES. KILLS ALL GREEN PLANT TISSUE. HIGHLY TOXIC TO HUMANS AND WILD-LIFE AND HARMFUL IF IN PROLONGED CONTACT WITH SKIN. DO NOT APPLY WHERE RUNOFF IS LIKELY AND KEEP OUT OF STREAMS AND PONDS. DESTROYS EMERGED GREEN PLANT TISSUE AND SUPPRESSES PERENNIALS. DO NOT APPLY UNDER CONDITIONS SUCH AS WIND OR COMBINATION OF NOZZLE AND PRESSURE THAT MAY RESULT IN MIST AND LIKELIHOOD OF DRAFT, SINCE IT WILL CAUSE SEVERE DAMAGE TO NEARBY CROPS OR FOOD.

3. A SUMMARY OF DR. GENTNER'S FINDINGS, EPA COMPENDIUMS AND BLOWUPS OF PRODUCT LABELS BEING POUCHED. INGERSOLL

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